

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CARPENTERS FRINGE BENEFIT)	
FUNDS OF ILLINOIS, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 10 C 2545
vs.)	
)	JUDGE SAMUEL DER-YEGHIAGAN
SELLERGREN BROS., INC.,)	
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on June 28, 2010 request this Court enter judgment against Defendant, SELLERGREN BROS., INC., an Illinois corporation. In support of that Motion, Plaintiffs state:

1. On June 28, 2010, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.

2. Plaintiffs' auditors completed that audit on August 11, 2010. The audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$10,173.00. (See Affidavit of Deborah L. French).

3. Additionally, the amount of \$4,189.06 is due for liquidated damages. (French Aff. Par. 7). Plaintiffs' auditing firm of Bansley and Kiener, L.L.P. charged Plaintiffs \$1,535.50 to perform the audit examination and complete the report (French Aff. Par. 6).

4. In addition, Plaintiffs' firm has expended the total amount of \$435.00 for costs and \$1,863.75 in reasonable attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$18,196.31.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$18,196.31.

/s/ Patrick N. Ryan

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 15th day of September 2010:

Mr. Lee F. DeWald
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/s/ Patrick N. Ryan _____

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